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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

WRITER'S DIRECT NO.
(202) 828-0155

April 24, 2001

BY HAND

Ms. Magalie Roman Salas
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Written Ex Parte Presentation
CC Docket No. 94-102

Rec'd 0+14

Dear Ms. Salas:

On behalf of my client QUALCOMM Incorporated ("QUALCOMM"), this is to provide the Commission with initial results from the first widespread commercial launch of QUALCOMM's wireless assisted GPS position location technology, gpsOne. In early April 2001, SECOM Co., Ltd. ("SECOM"), a Japanese security company, initiated a new service in Japan by which subscribers can locate and direct emergency assistance to individuals or vehicles who carry a terminal unit containing a QUALCOMM MSM3300 chipset, through the use of gps satellites, KDDI's cellular system, and QUALCOMM's technology. A January 16, 2001 press release from SECOM describing the new service is attached hereto.

The initial results from this deployment show the enormous public demand and need for these highly accurate location services. In the first two weeks of SECOM's service, SECOM received 70,000 orders for the service, and shipped 10,000 units to subscribers. In that same two-week time frame, SECOM's service was used to fix a location 75,000 times, or approximately 5,000 fixes per day. The benefits to public safety from this new service are already substantial and will increase exponentially as subscribers are added. For example, in just the initial days of the commercial deployment, a SECOM security guard was able to locate a little girl who was lost in a large park in Osaka.

QUALCOMM looks forward to the deployment of this same technology this Fall in the United States by wireless carriers here. The MSM3300 chipset which is being deployed in the SECOM device is exactly the same chipset which will be deployed this summer in wireless handsets in Japan and soon thereafter in wireless handsets in the United States. The success of the SECOM launch proves therefore that handset-based assisted gps technology is available, reliable, and affordable. QUALCOMM is on schedule in the delivery of its chipsets to its

licensed handset manufacturers. It is now quite apparent that consumers want and need highly accurate wireless location technology, and that the public safety benefits from this technology will be enormous.

Respectfully submitted,

Dean R. Brenner
Attorney for QUALCOMM Incorporated

cc: Chairman Michael Powell
Commissioner Susan Ness
Commissioner Harold Furchtgott-Roth
Commissioner Gloria Tristani
Thomas Sugrue, Esq.
James Schlicting, Esq.
Kris Monteith, Esq.
Blaise Scinto, Esq.
Dan Grosh, Esq.

Press Release

January 16, 2001
SECOM Co., Ltd.

SECOM Launches CoCo SECOM,
New Security Service for People and Vehicles
Offers Advanced Geographic Position Detection
Featuring Lightweight, Compact Service Terminal at Reasonable Rates

SECOM Co., Ltd. (headquarters: Shibuya-ku, Tokyo; president: Toshitaka Sugimachi; capital: Y66.1 billion) will launch CoCo SECOM, a new service for locating the position of people and vehicles, with nationwide availability scheduled to begin on April 2. The new service makes the most of SECOM's security service network as well as geographic positioning information provided by the corporation's highly sophisticated position locating technology. This new technology uses GPS (Global Positioning System) satellites and cellular phone base stations. The service is being offered at rates affordable for virtually everyone. The monthly charge for the basic service of detecting the geographic position of a person is Y500. The basic charge for detecting a vehicle is Y900 per month. Offered at such easily affordable rates, the service should soon find a broad range of subscribers and thus contribute to making society safer.

With dramatic changes in our social environment, we are witnessing increasing numbers of kidnappings, elderly people wandering away due to senile dementia, and family members and friends going missing. We are more concerned with these problems than ever before. Another concern is the rising number of stolen two-wheeled and four-wheeled vehicles. A survey conducted by Japan's National Police Agency shows that some 240,000 motorbikes and 43,000 cars were stolen in Japan in 1999 alone. This constitutes a serious problem in our society.

SECOM was the first to develop an office security system in Japan. And since then, we have been the leading provider of security services, extending our offerings to cover residences as well. We have always responded promptly to the need for safety and security, whether at the social or the household level. Now, we have combined all of our security technologies and service networks into CoCo SECOM, a new service that goes beyond conventional building-centered security services. It is a totally new kind of security service that covers people, as well as two-wheeled and four-wheeled vehicles, and other movable goods.

CoCo SECOM locates the position of a person or a vehicle using a compact terminal developed exclusively for this service, and then informs the subscriber of the position detected. In addition to this, SECOM's emergency personnel can rush to that position if necessary. Both services are available 24 hours a day, 365 days a year. The CoCo SECOM system offers several major advantages:

1. Sophisticated Position Detection

The CoCo SECOM terminal has far greater sensitivity for connecting with GPS satellites than the communication terminals of existing position detection systems that use such satellites. Conventional terminals often fail to communicate with the satellites when they are inside a car, a bag, a building (especially when close to the outer walls), or within a forested area. Even in those unfavorable environments, however, the CoCo SECOM terminal, though small in size, can communicate accurately with the GPS satellites assuring that position detection is always available. The new detection service employs three separate methods in locating the target's position:

1) Using GPS satellites alone
2) Using both GPS satellites and cellular phone base stations
3) Using cellular phone base stations alone

Thus, even if communication with the GPS satellites is interrupted, the detection system can use cellular phone base stations as virtual GPS satellites to find the precise position of the target anywhere in Japan (within the service areas of the cellular phone networks, which cover more than 99% of the entire nation's area).

2. Small and Lightweight Portable GPS Terminal

The GPS communication terminals of traditional position detection systems were too large and heavy to carry around. In contrast, the CoCo SECOM terminal was designed and built to be very small and lightweight, similar to a cellular phone handset in size and weight. The terminal can accompany the target person or vehicle at all times, anywhere.

3. Position Detection Offered at Very Reasonable Rates

Here is an explanation of how the basic service of CoCo SECOM works:

1) The target person carries the compact terminal of CoCo SECOM. Or the terminal is attached to the target vehicle.
2) Whenever the necessity to find the location of the target arises, the newly established SECOM Position Information Center (tentative name) searches for the target's position and sends the position information (either as an address or a map) to the subscriber by telephone or the Internet.
3) If a subscriber calls SECOM's emergency personnel for help, the corporation sends emergency personnel from the Emergency Station closest to the target. There are some 900 Emergency Stations nationwide. The personnel will secure the safety of the target person or vehicle bearing the CoCo SECOM terminal. They will then report the target's situation to the subscriber and, if appropriate, call the police as well.

The basic service is offered at only Y500 per month per target person (plus initial contract fee of Y5,000 and another Y2,000 for the necessary equipment), or at Y900 per

month per target vehicle (plus initial contract fee of Y5,000 and another Y2,000 for the necessary equipment if the target is a motorbike, Y5,000 for the equipment if the target is a four-wheeled car). Position information is provided to the subscriber via the Internet up to twice a month at no extra charge. From the third time and up (in one month), position information via the Internet is available for Y100 per request. Information via the telephone is available at Y300 per request. (Help from the Emergency Personnel incurs extra charges.)

Press Contact
Yasuda, Public Relations Room, SECOM Co., Ltd. Phone: 03-5775-8211

For inquiries related to the new service, contact:
Planning Room, SECOM Co., Ltd. Phone: 03-5775-8045